

# EXHIBIT H

# RE: LUPE v. Abbott, 5:21-cv-844 (WD Tex): Discovery Correspondence - M&C (Intervenor-Defendants)

Elena Rodriguez Armenta <erodriguezarmenta@elias.law>

Mon 9/19/2022 11:16 AM

To: Roberts, Charles E. <cetroberts@jonesday.com>;

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Counsel,

We are in receipt of your August 29 letter concerning document production and your August 12 Responses and Objections to Plaintiffs' First Set of Interrogatories. We write to better understand the status of the GOP Intervenors' collection and review of documents in this matter.

Plaintiffs first served requests for production on the GOP Intervenors over two months ago. Nonetheless, your correspondence reflects that the GOP Intervenors' collection and review of documents remains at a very preliminary stage and that you have not yet collected documents from your clients, never mind begun producing any documents in response to our two-month-old requests. At the same time, your responses to our First Set of Interrogatories reflect that you intend to address most of our interrogatories by identifying documents that have not been produced to us.

To keep discovery moving forward, please provide us this week with dates certain for when you will provide proposed custodians for each GOP Intervenor and proposed search terms for collecting documents from these custodians. Please also indicate whether GOP Intervenors intend to accept or decline Plaintiffs' proposal regarding the existing protective orders.

We are glad to make ourselves available to discuss any of these issues.

Best regards,

Elena

**Elena Rodriguez Armenta** (she/her)

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**Subject:** RE: LUPE v. Abbott, 5:21-cv-844 (WD Tex): Discovery Correspondence - M&C (Intervenor-Defendants)

Counsel,

Attached please find discovery correspondence regarding the meet and confer held on August 11, 2022. Please let us know if you would like to discuss.

Best,  
Chuck

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Chuck Roberts  
Associate

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**Subject:** LUPE v. Abbott, 5:21-cv-844 (WD Tex): Discovery Correspondence - M&C (Intervenor-Defendants)

**\*\* External mail \*\***

Counsel,

Attached please find discovery correspondence memorializing the meet and confer held on August 11, 2022, regarding GOP Intervenor's Responses and Objections to Plaintiffs' First Set of Requests for Production. Please let us know if you would like to discuss.

All the best,

Elena

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